

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	<div style="background-color: black; width: 150px; height: 1.2em;"></div>
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF PLAINTIFF
NETLIST, INC.'S MOTION TO STRIKE CERTAIN OPINIONS OF
SAMSUNG DEFENDANTS' EXPERT MR. JOSEPH MCALEXANDER**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Plaintiff Netlist, Inc.’s Motion to Strike Certain Opinions of Samsung Defendants’ Expert Mr. Joseph McAlexander. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of the Initial Expert Report of Joseph C. McAlexander III, dated November 20, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of Attachment A to the Initial Expert Report of Joseph C. McAlexander III, dated November 20, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of Attachment B to the Initial Expert Report of Joseph C. McAlexander III, dated November 20, 2023.

5. Attached as **Exhibit 4** is a true and correct copy of Attachment C to the Initial Expert Report of Joseph C. McAlexander III, dated November 20, 2023.

6. Attached as **Exhibit 5** is a true and correct copy of the Rebuttal Expert Report of Joseph C. McAlexander III, dated December 21, 2023.

7. Attached as **Exhibit 6** is a true and correct copy of Attachment A to the Rebuttal Expert Report of Joseph C. McAlexander III Relating to U.S. Patent No. 7,619,912, dated December 21, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of Attachment B to the Rebuttal Expert Report of Joseph C. McAlexander III Relating to U.S. Patent No. 11,093,417, dated December 21, 2023.

9. Attached as **Exhibit 8** is a true and correct copy of Attachment C to the Rebuttal

Expert Report of Joseph C. McAlexander III Relating to U.S. Patent No. 10,268,608, dated December 21, 2023.

10. Attached as **Exhibit 9** is a true and correct copy of Attachment D to the Rebuttal Expert Report of Joseph C. McAlexander III Relating to Opinions Regarding the Technical Comparability of Licenses, dated December 21, 2023.

11. Attached as **Exhibit 10** is a true and correct copy of the Order on Pretrial Motions and Motions *in Limine* filed as Dkt. 432 in Case No. 2:21-cv-00463-JRG, dated April 5, 2023.

12. Attached as **Exhibit 11** is a true and correct copy of Samsung's 11/20/2023 Supplemental Objections and Responses to Plaintiff netlist, Inc.'s Amended First Set of Interrogatories (Nos. 1-20), dated November 20, 2023.

13. Attached as **Exhibit 12** is a true and correct copy of JM21V, dated November 2023.

14. Attached as **Exhibit 13** is a true and correct copy of the Report & Recommendations filed as Dkt. 421 in Case No. 2:22-cv-203-JRG-RSP on January 8, 2024.

15. Attached as **Exhibit 14** is a true and correct copy of the Supplemental Expert Report of Joseph C. McAlexander III, dated December 20, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 16, 2024, in Marshall, Texas.

By /s/ Jason G. Sheasby
Jason G. Sheasby